

# ORIGINAL

1 to 6

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

GERARD B. and MARGARET F., as Parents and )  
Nearest Friends of KELSEY B., )  
Plaintiffs )

V.

CAMP HILL SCHOOL DISTRICT,  
Defendant

No. 1:CV-01-1082

2/Case

**FILED**  
**HARRISBURG, PA**

MAY 23 2003

MARY E. D'ANDREA, CLERK  
Per \_\_\_\_\_  
Deputy Clerk

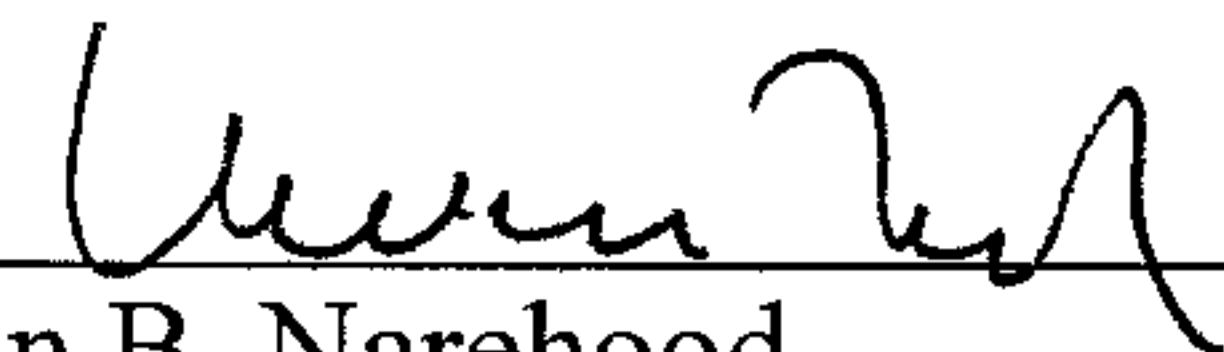
**MOTION FOR  
ATTORNEY'S FEES AND COSTS AND RELATED EXPENSES**

Pursuant to this Court's Order of May 7, 2003, and the Individuals with Disabilities Act (IDEA), 20 U.S.C. §1415(i)(3)(B), Gerard B. and Margaret F. (formerly Margaret F. B.), as Parents and Nearest Friends of Kelsey B., by and through their attorneys, Gibbel, Kraybill & Hess, hereby move this Court for an award of attorney's fees and reimbursement of costs. As the prevailing party in this action, Gerard B. and Margaret F. seek an award of fees and costs expended in pursuing a Due Process Hearing resulting in a favorable decision by a Special Education Hearing Officer dated February 26, 2001, and in appealing the unfavorable decision from the Special Education Appeals Panel in their Opinion No. 1111 dated April 20, 2001. In support of this Motion, Gerard B. and Margaret F. submit the accompanying Memorandum of Law and Exhibits, which are incorporated by reference as though fully set forth herein.

WHEREFORE, Gerard B. and Margaret F. request that their Motion be granted and that they be awarded attorney's fees in the amount of \$29,549.51, and costs of expert testimony of Alan Babcock in the amount of \$395.00. All fees are to be paid by the Camp Hill School District.

Respectfully submitted,

GIBBEL, KRAYBILL & HESS

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